

Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Email: asimonsen@cov.com

*Attorneys for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings, LLC;
Facebook Operations, LLC; Facebook
Payments, Inc.; Facebook Technologies, LLC;
Instagram, LLC; Siculus, Inc.; and Mark Elliot
Zuckerberg*

*Additional parties and counsel listed on
signature pages*

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS FILING RELATES TO:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Thomas S. Hixson

**STIPULATED REQUEST FOR ORDER
CHANGING TIME (PRESERVATION
ORDER)**

Pursuant to Civil Local Rules 6-1(b) and 6-2, the parties, through their undersigned counsel, hereby stipulate and respectfully request that the Court extend the deadline to file a proposed Preservation Order or letter briefing on disputes regarding that order to May 26, 2023. The parties declare in support of this request:

1. Pursuant to Case Management Order No. 5 (Dkt. 164), the parties are currently negotiating a proposed Preservation Order, along with a proposed Plaintiff Preservation Information Form (to facilitate the preservation of user account data);

2. Judge Gonzalez Rogers previously extended the parties' deadline to submit a joint proposed Preservation Order or disputes regarding that order from March 24, 2023 to April 7, 2023, and directed the parties to submit further requests for extensions of that deadline to Judge Hixson;

3. Pursuant to the parties' stipulation, the Court previously extended the deadline from April 7, 2023, to April 28, 2023;

4. The parties intend to submit a proposed Plaintiff Preservation Information Form or letter briefing on disputes regarding that form by the April 28, 2023 deadline;

5. The parties have been working diligently to eliminate or narrow disputes over the proposed Preservation Order, including through a series of Defendant-specific meet-and-confers regarding Defendants' preservation efforts and relevant data sources and systems;

6. The parties believe they would benefit from more time to continue those conferrals and attempt to narrow the disputes they ask the Court to resolve;

7. Extending this deadline will not affect any other deadline fixed by the Court;

THEREFORE, pursuant to Local Rules 6-1(b) and 6-2, the parties stipulate and respectfully request that the Court extend the deadline to submit a joint proposed Preservation Order or letter briefing regarding disputes over that order to May 26, 2023.

IT IS SO STIPULATED AND AGREED.

DATED: April 24, 2023

Respectfully submitted,

COVINGTON & BURLING LLP

/s/ Ashley M. Simonsen

Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*
Paul W. Schmidt, *pro hac vice*
COVINGTON & BURLING LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291

Email: pajones@cov.com
Email: pschmidt@cov.com

Emily Johnson Henn (State Bar. No. 269482)
COVINGTON & BURLING LLP
3000 El Camino Real
5 Palo Alto Square, 10th Floor
Palo Alto, CA 94306
Telephone: + 1 (650) 632-4700
Facsimile: +1 (650) 632-4800
Email: ehenn@cov.com

*Attorney for Defendants Meta Platforms, Inc. f/k/a
Facebook, Inc.; Facebook Holdings, LLC;
Facebook Operations, LLC; Facebook Payments,
Inc.; Facebook Technologies, LLC; Instagram,
LLC; Siculus, Inc.; and Mark Elliot Zuckerberg*

/s/ Christopher A. Seeger

CHRISTOPHER A. SEEGER
CHRISTOPHER L. AYERS
SEEGER WEISS, LLP
55 CHALLENGER ROAD, 6TH FLOOR
RIDGEFIELD PARK, NJ 07660
Telephone: + 1 (973) 639-9100
Facsimile: + 1 (973) 679-8656
Email: cseeger@seegerweiss.com
Email: cayers@seegerweiss.com

LEXI J. HAZAM
**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
275 BATTERY STREET, 29TH FLOOR
SAN FRANCISCO, CA 94111-3339
Telephone: + 1 (415) 956-1000
Email: lhazam@lchb.com

PREVIN WARREN
MOTLEY RICE LLC
401 9th Street NW Suite 630
Washington DC 20004
Telephone: + 1 (202) 386-9610
Email: pwarren@motleyrice.com

Co-Lead Counsel

JENNIE LEE ANDERSON
ANDRUS ANDERSON, LLP
155 MONTGOMERY STREET, SUITE 900
SAN FRANCISCO, CA 94104
Telephone: + 1 (415) 986-1400
Email: jennie@andrusanderson.com

Liaison Counsel

JOSEPH G. VANZANDT
**BEASLEY ALLEN CROW METHVIN
PORTIS & MILES, P.C.**
234 COMMERCE STREET
MONTGOMERY, AL 36103
Telephone: + 1 (334) 269-2343
Email: joseph.vanzandt@beasleyallen.com

EMILY C. JEFFCOTT
MORGAN & MORGAN
220 W. GARDEN STREET, 9TH FLOOR
PENSACOLA, FL 32502
Telephone: + 1 (850) 316-9100
Email: ejeffcott@forthepeople.com

RON AUSTIN
RON AUSTIN LAW
400 Manhattan Blvd.
Harvey LA, 70058
Telephone: + 1 (504) 227-8100
Email: raustin@ronaustinlaw.com

MATTHEW BERGMAN
GLENN DRAPER
SOCIAL MEDIA VICTIMS LAW CENTER
821 SECOND AVENUE, SUITE 2100
SEATTLE, WA 98104
Telephone: + 1 (206) 741-4862
Email: matt@socialmediavictims.org
Email: glenn@socialmediavictims.org

JAMES J. BILSBORROW
WEITZ & LUXENBERG, PC
700 BROADWAY
NEW YORK, NY 10003
Telephone: + 1 (212) 558-5500
Facsimile: + 1 (212) 344-5461
Email: jbilsborrow@weitzlux.com

1 PAIGE BOLDT
2 **WATTS GUERRA LLP**
3 4 Dominion Drive, Bldg. 3, Suite 100
4 San Antonio, TX 78257
5 Telephone: + 1 (210) 448-0500
6 Email: PBoldt@WattsGuerra.com

7 THOMAS P. CARTMELL
8 **WAGSTAFF & CARTMELL LLP**
9 4740 Grand Avenue, Suite 300
10 Kansas City, MO 64112
11 Telephone: + 1 (816) 701 1100
12 Email: tcartmell@wcllp.com

13 JAYNE CONROY
14 **SIMMONS HANLY CONROY, LLC**
15 112 MADISON AVE, 7TH FLOOR
16 NEW YORK, NY 10016
17 Telephone: + 1 (917) 882-5522
18 Email: jconroy@simmonsfirm.com

19 CARRIE GOLDBERG
20 **C.A. GOLDBERG, PLLC**
21 16 Court St.
22 Brooklyn, NY 11241
23 Telephone: + 1 (646) 666-8908
24 Email: carrie@cagoldberglaw.com

25 KIRK GOZA
26 **GOZA & HONNOLD, LLC**
27 9500 Nall Avenue, Suite 400
28 Overland Park, KS 66207
Telephone: + 1 (913) 451-3433
Email: kgoza@gohonlaw.com

SIN-TINY MARY LIU
**AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC**
17 EAST MAIN STREET, SUITE 200
PENSACOLA, FL 32502
Telephone: + 1 (510) 698-9566
Email: mliu@awkolaw.com

ANDRE MURA
GIBBS LAW GROUP, LLP
1111 BROADWAY, SUITE 2100
OAKLAND, CA 94607

1 Telephone: + 1 (510) 350-9717
2 Email: amm@classlawgroup.com

3 EMMIE PAULOS
4 **LEVIN PAPANTONIO RAFFERTY**
5 316 SOUTH BAYLEN STREET, SUITE 600
6 PENSACOLA, FL 32502
7 Telephone: + 1 (850) 435-7107
8 Email: epaulos@levinlaw.com

9 ROLAND TELLIS
10 DAVID FERNANDES
11 **BARON & BUDD, P.C.**
12 15910 Ventura Boulevard, Suite 1600
13 Encino, CA 91436
14 Telephone: + 1 (818) 839-2333
15 Facsimile: + 1 (818) 986-9698
16 Email: rtellis@baronbudd.com
17 Email: dfernandes@baronbudd.com

18 ALEXANDRA WALSH
19 **WALSH LAW**
20 1050 Connecticut Ave, NW, Suite 500
21 Washington D.C. 20036
22 Telephone: + 1 (202) 780-3014
23 Email: awalsh@alexwalshlaw.com

24 MICHAEL M. WEINKOWITZ
25 **LEVIN SEDRAN & BERMAN, LLP**
26 510 WALNUT STREET
27 SUITE 500
28 PHILADELPHIA, PA 19106
Telephone: + 1 (215) 592-1500
Email: mweinkowitz@lfsbalw.com

DIANDRA "FU" DEBROSSE ZIMMERMANN
DICELLO LEVITT
505 20th St North
Suite 1500
Birmingham, Alabama 35203
Telephone: + 1 (205) 855-5700
Email: fu@dicellolevitt.com

ROBERT H. KLONOFF
ROBERT KLONOFF, LLC
2425 SW 76TH AVENUE
PORTLAND, OR 97225

1 Telephone: + 1 (503) 702-0218
2 Email: klonoff@usa.net

3 HILLARY NAPPI
4 **HACH & ROSE LLP**
5 112 Madison Avenue, 10th Floor
6 New York, New York 10016
7 Telephone: + 1 (212) 213-8311
8 Email: hnappi@hrsclaw.com

9 ANTHONY K. BRUSTER
10 **BRUSTER PLLC**
11 680 N. Carroll Ave., Suite 110
12 Southlake, TX 76092
13 Telephone: + 1 (817) 601-9564
14 Email: akbruster@brusterpllc.com

15 FRANCOIS M. BLAUDEAU, MD JD FACHE
16 FCLM
17 **SOUTHERN INSTITUTE FOR MEDICAL**
18 **AND LEGAL AFFAIRS**
19 2762 B M Montgomery Street, Suite 101
20 Homewood, Alabama 35209
21 Telephone: + 1 (205) 564-2741
22 Email: francois@southernmedlaw.com

23 JAMES MARSH
24 **MARSH LAW FIRM PLLC**
25 31 HUDSON YARDS, 11TH FLOOR
26 NEW YORK, NY 10001-2170
27 Telephone: + 1 (212) 372-3030
28 Email: jamesmarsh@marshlaw.com

Attorneys for Plaintiffs

KING & SPALDING LLP

/s/ Geoffrey M. Drake

Geoffrey M. Drake
King & Spalding LLP
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309
Telephone: + 1 (404) 572-4600
Facsimile: + 1 (404) 572-5100
Email: gdrake@kslaw.com

FAEGRE DRINKER LLP

/s/ Andrea Roberts Pierson

Andrea Roberts Pierson
Faegre Drinker LLP
300 N. Meridian Street, Suite 2500
Indianapolis, IN 46204
Telephone: + 1 (317) 237-0300
Facsimile: + 1 (317) 237-1000
Email: andrea.pierson@faegredrinker.com

Attorneys for Defendants TikTok Inc. and ByteDance Inc.

MUNGER, TOLLES & OLSEN LLP

/s/ Jonathan H. Blavin

Jonathan H. Blavin, SBN 230269
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077

Rose L. Ehler (SBN 29652)
Victoria A. Degtyareva (SBN 284199)
Ariel T. Teshuva (SBN 324238)
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

Lauren A. Bell, *pro hac vice*
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Ave., NW St.,
Suite 500 E
Washington, D.C. 20001-5369
Telephone: (202) 220-1100
Facsimile: (202) 220-2300

Attorneys for Defendant Snap Inc.

**WILSON SONSINI GOODRICH & ROSATI
Professional Corporation**

/s/ Brian M. Willen

Brian M. Willen
Wilson Sonsini Goodrich & Rosati
bwillen@wsgr.com
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Telephone: (212) 999-5800
Facsimile: (212) 999-5899

Lauren Gallo White
Wilson Sonsini Goodrich & Rosati
lwhite@wsgr.com
Samantha A. Machock
smachock@wsgr.com
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099

Christopher Chiou
Wilson Sonsini Goodrich & Rosati
cchiou@wsgr.com
633 West Fifth Street
Los Angeles, CA 90071-2048
Telephone: (323) 210-2900
Facsimile: (866) 974-7329

*Attorneys for Defendants YouTube, LLC,
Google LLC, and Alphabet Inc.*

ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: April 24, 2023

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen